

EXHIBIT A

CIVIL COURT OF CITY OF NEW YORK
COUNTY OF QUEENS

RICHARD H. CAMPBELL,

Plaintiff,

-against-

PORTFOLIO RECOVERY ASSOCIATES, LLC,

Defendant.

X

Defendant's address:

Portfolio Recovery Associates, LLC
140 Corporate Boulevard
Norfolk, VA 23502

Index No.:

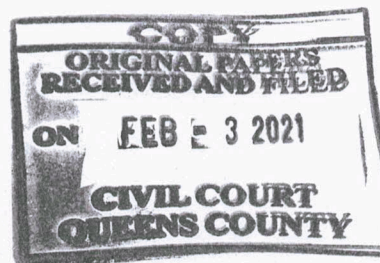
002725

SUMMONS

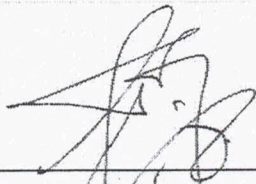
Plaintiff's Residence Address:
9035 Francis Lewis Blvd
Queens Village, NY 11428

The basis of this venue is:
Plaintiff's address

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York,
County of Queens, at the office of the Clerk of said Court at 89-17 Sutphin Blvd., Queens, New
York 11435 within the time provided by law as noted below and to file your Answer to the
annexed Complaint with the Clerk; upon your failure to Answer, judgment will be taken against
you for the sum of \$25,000.00 with interest from January 15, 2021, together with the costs of this
action.



Dated: January 15, 2021



Subhan Tariq, Esq.
The Tariq Law Firm, PLLC
Attorney for Plaintiff
34-18 Northern Blvd – Suite 2-25
Long Island City, NY 11101
Tel: (718) 674-1245

Note the law provides that:

- a) If this summons is served by its delivery to you personally within the City of New York, State of New York, you must appear and answer within TWENTY DAYS after such service; or
- b) If this summons is served by its delivery to any person other than you personally, or is served outside the City of New York, State of New York, or by publication, or by any means other than personal delivery to you within the City of New York, State of New York, you are allowed THIRTY DAYS after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.

CIVIL COURT OF CITY OF NEW YORK
COUNTY OF QUEENS

RICHARD H. CAMPBELL,

Index No.:

Plaintiff,

v.

VERIFIED COMPLAINT

PORTFOLIO RECOVERY ASSOCIATES, LLC,

Defendant.

X

Plaintiff, Richard H. Campbell ("Plaintiff"), by and through his attorney, Subhan Tariq, Esq., as and for his Complaint against Defendant, Portfolio Recovery Associates, LLC, (hereinafter referred to as "Defendant"), respectfully sets forth, complains and alleges, upon information and belief, the following:

PARTIES

1. Plaintiff Richard H. Campbell is a resident of State of New York and currently resides at 9035 Francis Lewis Blvd, Queens Village, NY 11428.
2. Defendant Portfolio Recovery Associates, LLC is a company engaged in the business of collecting debts with a principal place of business located at 140 Corporate Boulevard, Norfolk, VA 23502.
3. Plaintiff is a "consumer" as defined by the FDCPA, 15 USC § 1692a(3).
4. Defendant is a "debt collector" as defined and used in the FDCPA under 15 USC § 1692a(6).

FACTUAL ALLEGATIONS

5. Plaintiff repeats, reiterates, and incorporates the allegations contained in all preceding paragraphs of this Complaint with the same force and effect as if the same were fully set forth at length herein.
6. Plaintiff received two debt collection letters, both dated September 24, 2020, from Defendant.
7. Defendant's September 24, 2020 letters informed Plaintiff that it was attempting to collect on alleged past due balance of \$2,155.58 associated with a HSBC Bank account (the "HSBC account").
8. Defendant's September 24, 2020 letters also provided Plaintiff with notice that the statute of limitations on the HSBC account had expired.
9. However, on October 9, 2020, Plaintiff ran his Experian and Trans Union credit reports and noticed that Defendant is reporting the time-barred HSBC account on his Experian and Trans Union credit reports - despite the statute of limitations on the HSBC account being expired.
10. These are clearly tactics to misinform, mislead, harass, or deceive consumers about the nature and status of their account so as to assist Defendant in its goal of collecting on debt from these consumers.

CAUSE OF ACTION

**VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. §
1692 et seq.**

11. Plaintiff repeats, reiterates, and incorporates the allegations contained in all preceding paragraphs of this Complaint with the same force and effect as if the same were fully set forth at length herein.
12. 15 U.S.C. § 1692e – preface prohibits a debt collector from using false, deceptive, or misleading representation or means in connection with a debt collection.
13. Defendant is in violation of 15 U.S.C. §1692e – preface by reporting the time-barred HSBC account on Plaintiff’s Experian and Trans Union credit reports - despite the statute of limitations on the HSBC account being expired.
14. 15 U.S.C. § 1692e(2) prohibits a debt collector from communicating false or misleading representations to a consumer regarding the character, amount, or legal status of the alleged debt.
15. Defendant is in violation of 15 U.S.C. §1692e(2) by reporting the time-barred HSBC account on Plaintiff’s Experian and Trans Union credit reports - despite the statute of limitations on the HSBC account being expired.
16. 15 U.S.C. § 1692e(10) prohibits a debt collector from making any false representation or deceptive means to collect a debt or obtain information about a consumer.
17. Defendant is in violation of 15 U.S.C. §1692e(10) by reporting the time-barred HSBC account on Plaintiff’s Experian and Trans Union credit reports - despite the statute of limitations on the HSBC account being expired.

18. 15 U.S.C. § 1692f – preface prohibits a debt collector from using any unfair or unconscionable actions in connection with the collection of a debt.

19. Defendant is in violation of 15 U.S.C. § 1692f – preface by reporting the time-barred HSBC account on Plaintiff's Experian and Trans Union credit reports - despite the statute of limitations on the HSBC account being expired.

20. As a result of Defendant's violations of the FDCPA, Plaintiff has been damaged and is entitled to damages in accordance with the FDCPA.

DEMAND FOR TRIAL BY JURY

21. Plaintiff hereby respectfully requests a trial by jury for all claims and issues in its Complaint to which it is or may be entitled to a jury trial.

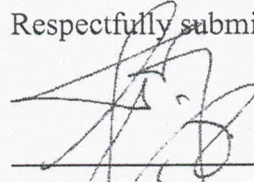
PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment from Defendant as follows:

- A. For actual damages provided and pursuant to 15 U.S.C. § 1692(k)(a)(1);
- B. For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(A)
- C. For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(B)
- D. For attorneys' fees and costs provided and pursuant to 15 U.S.C. 1692k(a)(3);
- E. A declaration that Defendant's practices violated the FDCPA; and
- F. For any such other and further relief, as well as further costs, expenses and disbursements of this action, as this Court may deem just and proper.

Dated: January 15, 2021

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Subhan Tariq', is written over a horizontal line.

Subhan Tariq, Esq.

Attorney I.D.# 5263074

The Tariq Law Firm, PLLC

Attorney for Plaintiff

34-18 Northern Blvd – Suite 2-25

Long Island City, NY 11101

Telephone: (718) 674-1245

Facsimile: (516) 453-0490

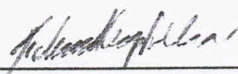
Email: subhan@tariqlaw.com

VERIFICATION

Richard H. Campbell, being duly sworn, deposes and says:

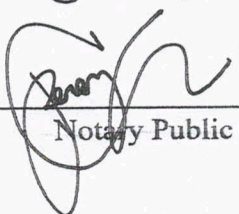
I am the Plaintiff in the above-entitled action. I have read the foregoing Complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters, I believe them to be true.

To the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are not frivolous as defined in Subsection (c) of Section 130-1.1 of the Rules of the Chief Administrative Judge (22 NYCRR).



Richard H. Campbell, Plaintiff

Sworn to before me this 15th
day of January, 2021



Notary Public

